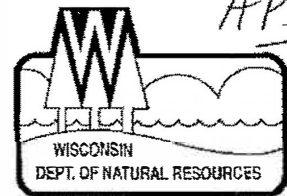


State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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Scott Walker, Governor
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March 5, 2012

George Czerniak
Acting Division Director
Air & Radiation Division
77 W. Jackson Blvd (A-183)
Chicago IL 60604

Subject: Wisconsin State Implementation Plan Submittal for PM_{2.5}

Dear Mr. Czerniak:

On May 12, 2011 Wisconsin DNR submitted a request to US EPA Region V to revise its State Implementation Plan (SIP) to include new permit requirements relating to PM_{2.5}. That submittal included permanent rules to:

- Define major source thresholds and significant emission increase levels;
- Establish significant impact levels and increment consumption thresholds;
- Establish inter-pollutant trading ratios for PM_{2.5}, SO₂ and NO_x; and
- Clarify existing non-attainment area permitting rules.

On July 21, 2011 US EPA through a memorandum announced a change in its policy concerning the development and adoption of inter-pollutant trading provisions for PM_{2.5} under state nonattainment area New Source Review programs. In it, EPA states it no longer supports the presumptive ratios provided in the preamble to the 2008 PM_{2.5} New Source Review Implementations Rule and that any ratio involving PM_{2.5} precursors submitted to EPA for approval for use in a state's inter-pollutant offset program for PM_{2.5} nonattainment areas must be accompanied by a technical demonstration that shows the net air quality benefits of such ratio for the PM_{2.5} nonattainment area in which it will be applied.

At this time Wisconsin has not conducted a technical demonstration to show that a net air quality benefit would occur in the 3 county non-attainment area if the previously presumptive SO₂ and NO_x ratios were used in a new source review. Therefore, in order to not hold up approval of the other elements in Wisconsin's May 12, 2011 request, Wisconsin DNR withdraws its request to have s. NR 408.06 (1) (cm), Wis. Adm. Code approved in the Wisconsin's SIP.

Questions regarding this request can be directed to Andrew Stewart of my staff at 608-266-6876 or andrew.stewart@wisconsin.gov.

Sincerely,

Bart Sponseller, Director
Bureau of Air Management

Cc: Pat Stevens-AD/8
Andrew Stewart-AM/7
Ralph Patterson-AM/7